

Exhibit A – Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
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: (Jointly Administered)
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:
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**ORDER GRANTING CREDITORS' COMMITTEE'S URGENT UNOPPOSED MOTION
TO FILE OMNIBUS REPLY IN SUPPORT OF RENEWED BANKRUPTCY RULE 2004
MOTION UNDER SEAL**

Upon consideration of the *Urgent Unopposed Motion to File Omnibus Reply in Support of Renewed Bankruptcy Rule 2004 Motion Under Seal* (the "Motion to Seal"),² the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to PROMESA section 310; (ii) venue is proper before this Court pursuant to PROMESA section 307(a); (iii) due and proper notice of this Motion to Seal has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Motion to Seal, the Court finds that it is appropriate for the Committee to file under seal an unredacted version of the *Omnibus*

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Renewed Motion.

Reply in Support of Renewed Motion Seeking Entry of Order, Under Bankruptcy Rule 2004, Authorizing Discovery With Respect to Certain Causes of Puerto Rico Financial Crisis Beginning on August 15, 2018 [Docket No. 3183] (filed on May 30, 2018) (the “Omnibus Reply”). Accordingly, it is hereby ORDERED THAT:

1. The Committee is authorized to file under seal an unredacted version of the Omnibus Reply.
2. The Clerk of Court will provide the Committee, the Oversight Board, and the Puerto Rico Financial Institutions (as that term is defined in the *Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis* [Docket No. 706] (the “Motion”)) access to the sealed materials through their counsel of record.

Dated: May __, 2018

HON. JUDITH G. DEIN
UNITED STATES MAGISTRATE JUDGE